



Nickolas J. Hagman  
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May 14, 2024

Via ECF

Hon. Nelson S. Román, U.S.D.J.  
Southern District of New York  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

**Re: *Taylor, et al v. Teladoc Health, Inc.*, No. 7:24-CV-00664-NRS**  
**Joint Request for Stay and Notice Regarding Letters in Related Action**

Dear Judge Roman:

Plaintiffs and Defendant Teladoc Health, Inc. (“Teladoc”) write jointly to request a stay of deadlines in this action and to notify the Court of pending requests in a related case that impacts those deadlines.

On April 15, 2024, Plaintiffs in this action and the plaintiffs in the related case pending before this Court, *Pattison, et al v. Teladoc Health, Inc.*, No. 7:23-cv-11305-NRS, requested a pre-motion conference concerning their motion to consolidate *Pattison* and *Taylor*. *Pattison* Dkt. 20. The same day, both groups of plaintiffs requested a pre-motion conference concerning their motion to appoint Plaintiffs’ counsel as interim class counsel following the consolidation of the related actions. *Pattison* Dkt. No. 21. Teladoc took no position on either request. Both requests remain pending. Enclosed herewith are copies of those letters.

Currently, pursuant to the Court’s endorsement of Teladoc’s agreed request for an extension, Teladoc’s deadline to respond to the *Taylor* complaint is May 20, 2024. See Dkt. 18. Should the Court grant the request to consolidate, however, that deadline will become moot, as Plaintiffs intend to file a superseding consolidated complaint, and Teladoc intends to respond thereto, on the schedule set by the Stipulation and Order Modifying Briefing Schedules entered by the Court. *Pattison* Dkt. 19.

The parties respectfully request that the Court stay all deadlines in this action, including Teladoc’s May 20, 2024, deadline to respond to the Complaint, pending resolution of the requests for consolidation of this action and *Pattison*.

Respectfully submitted,

/s/ Joseph S. Tusa  
**TUSA P.C.**

Nickolas J. Hagman  
**CAFFERTY CLOBES**  
**MERIWETHER & SPRENGEL, P.C.**  
*Counsel for Plaintiffs*  
*Mychelle Taylor and Muhammad Uddin*

cc: Counsel of Record (by ECF)

/s/ Livia M. Kieser  
**KING & SPALDING**  
*Counsel for Defendant Teladoc Health, Inc.*

Enclosures (2)

Pattison Letter Regarding Motion to Consolidate (Pattison Dkt. No. 20) (**Ex. 1**)  
Pattison Letter Regarding Motion to Appoint Leadership (Pattison Dkt. No. 21) (**Ex. 2**)